



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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August 10, 2004

Site Update, BNSF Former Maintenance and Fueling Facility, Skykomish, Washington

Dear Community Member,

Since our last update in January, we have heard from many of you with questions and concerns about the status of the cleanup, so I would like to take this opportunity to provide a site update.

Dispute Resolution: Last fall, BNSF initiated a dispute resolution process regarding technical issues around cleanup levels for protection of human health and the environment. The Department of Ecology settled the dispute resolution on May 20, 2004. The main outcome was that cleanup levels established by Ecology in the draft Feasibility Study (FS) will be used for this site.

Draft Feasibility Study and Environmental Impact Statement: The draft FS and Environmental Impact Statement (EIS) were initially integrated into one document. We realize now that this integration made it difficult for the public to review. This draft FS/EIS will now be split into separate documents to facilitate a path forward.

The FS evaluates different approaches to cleaning up the site. BNSF recently revised the draft FS and Ecology is currently reviewing these revisions. If the revised draft FS contains adequate information to support the choice of a cleanup action, Ecology will approve the revised draft FS as the final FS. Ecology is hopeful that this approval may occur as early as September. The revisions to the draft FS are expected to include:

- An evaluation of BNSF's preferred cleanup alternative in comparison to the other alternatives;
- Cleanup levels (minimum concentrations of petroleum and other chemicals for soil, groundwater, etc.) that must be met for the site to be considered safe without property restrictions;
- Remediation levels (less stringent concentrations of petroleum and other chemicals that may result in a partial cleanup and property restrictions);
- Points of compliance (proposed locations where the cleanup levels must be met);
- Evaluations of the effect of the petroleum and other hazardous substances on plants and animals, as well as wetlands, at the site; and
- Results of the "bench scale" (laboratory) study on the effectiveness of surfactant flushing and bioremediation technologies for this site.

Because additional important information on proposed cleanup alternatives and cleanup levels has become available since the release of the draft EIS, Ecology will prepare and issue a supplemental draft EIS for public comment along with the draft Cleanup Action Plan (CAP) and draft consent decree – expected to occur next summer/fall. A final EIS will then be issued with the final CAP. The final EIS will respond to public comments received during the comment periods for both the draft EIS and the supplemental draft EIS.



Further Sampling: Based on public comments received last fall, several areas of the site are being further investigated and sampled by Ecology this summer. These areas are: just east and west of the 5th Street Bridge by the flood levee; in and around the former Maloney Creek Channel including the library property; U.S. Forest Service property south of the railyard; next to the flood levee between 2nd and 3rd Streets; and down-river. We expect this work to be completed in September. This sampling will help increase our understanding of the site and assist with final cleanup decisions.

Pilot Testing: In early July, BNSF submitted a report to Ecology on the results of the bench-scale testing which evaluated three technologies for cleaning up petroleum:

- Bioremediation – the breakdown of petroleum over time by naturally-occurring bacteria in the ground. The process is enhanced by adding nutrients which help the bacteria to flourish.
- Flushing – water and chemicals (surfactants) are injected into the ground to break down and mobilize petroleum in the soil or groundwater. This is similar to how laundry soap works.
- Chemical oxidation – ozone gas, a very active form of oxygen, is injected into the ground to enhance natural breakdown of the petroleum.

Ecology is currently reviewing this report and evaluating whether a pilot test (a field test in town) should be conducted to determine how well these technologies work on a larger scale and under actual conditions in Skykomish.

BNSF's Preferred Cleanup Alternative: Ecology received BNSF's preferred cleanup alternative on May 25, 2004. We are reviewing this alternative as part of the FS revisions. Please note that this is **not** the final cleanup plan for the site; it is BNSF's preference. A final cleanup plan has not yet been chosen, and will be developed only after formal review and public comment on the draft CAP. Ecology ultimately must approve the final cleanup chosen for this site and issue the CAP. It is expected that Ecology and BNSF will negotiate BNSF's responsibility for final cleanup through a Consent Decree, which will settle BNSF's liability in exchange for performance of the cleanup. It is important to note that Ecology has no involvement in any settlement that may occur between BNSF and any private citizen or the Town of Skykomish.

Your input in the public comment process helps inform Ecology of public expectations for cleanup, and will help Ecology choose a cleanup action that will be protective of Skykomish residents and the environment. Ecology encourages you to remain involved in the process as cleanup decisions progress.

Schedule: We have included a revised cleanup schedule so you can see what is coming up in the next year. Please remember that this is an approximate and ambitious schedule that we will work hard to adhere to. If there are any changes, we will be sure to let you know. Ecology is working very hard to bring resolution to the contamination issues at this site. It takes time to make careful and thoughtful decisions. Thank you for your patience and participation throughout this process.

If you have any questions about this update or the overall cleanup, please feel free to call me at (425) 649-7209.

Sincerely,



Louise Bardy
Project Manager